

REICHELLAW PC
MARK REICHEL, ATTORNEY AT LAW
State Bar #155034
455 CAPITOL MALL, SUITE 802
SACRAMENTO, CA 95814
916.548.7398
mark@reichellaw.com
www.reichellaw.com

Attorney for Defendant
NAPOLEON WASHINGTON

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NAPOLEON WASHINGTON,

Defendant

Case No.: 25-CR-00056 DAD

STIPULATION ON DEFENSE REQUESTED
ORDER FOR DEFENDANT'S
TEMPORARY RELEASE TO ATTEND
FUNERAL; ORDER THEREON

Date:

Time:

Court: Hon. SEAN C. RIORDAN

The parties to this action, Plaintiff United States of America by and through Assistant United States Attorney Charles Campbell, and Defendant by and through his attorney Mark J. Reichel, provides this unopposed defense request for the defendant to be temporarily released as set forth hereinafter. The request is for an Order granting Mr. Washington's temporary release from the Sacramento County Jail on Thursday, May 29, 2025 from 8:00 a.m. to 5:00 p.m., to attend the funeral of his brother, Ernest Washington, who passed away on Wednesday, May 7, 2025, and is made pursuant to 18 U.S.C. § 3142(i). The death represents a significant loss for the defendant.

STIPULATION ON DEFENSE REQUESTED ORDER FOR DEFENDANT'S TEMPORARY
RELEASE

1 The defendant is pretrial on the matter, and the plaintiff does not oppose the Order
2 allowing Mr. Washington to be temporarily released from the Sacramento County Jail to the
3 custody of Investigator Fred Scoville on Thursday, May 29, from 8:00 a.m. to 5:00 p.m. Mr.
4 Washington's activity will be limited to traveling from the Sacramento County Jail to attend service
5 at 11:00 a.m. at Bethel Community Church located at 600 East Tabor Avenue, Fairfield, CA., 94590.
6

7 Investigator Scoville will escort Mr. Washington to the church and cemetery and remain with
8 him at all times until his return to the Sacramento County Jail.

9
10 IT IS SO STIPULATED.

11 Dated: May 19, 2025

/s/ CHARLES CAMPBELL

CHARLES CAMPBELL

Assistant United States Attorney

12 Dated: May 19, 2025

/s/ MARK REICHEL

MARK REICHEL

Counsel for Defendant

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STIPULATION ON DEFENSE REQUESTED ORDER FOR DEFENDANT'S TEMPORARY
RELEASE

ORDER FOR TEMPORARY RELEASE

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, and good cause appearing to exist, the Court orders the following:

1. NAPOLEON WASHINGTON, X-REF X-5575759, DOB: 12/23/1980, shall be released from the Sacramento County Jail on a "Temporary Out" on May 29, 2025, at 8:00 a.m., to the temporary custody of Investigator Fred Scoville, who has agreed to act as third-party custodian.
2. Upon temporary release, Mr. Washington shall remain with the third-party custodian while traveling from the Sacramento County Jail to Bethel Community Church located at 600 East Tabor Avenue, Fairfield, CA 94533 to attend the 11:00 a.m. services.
3. Investigator Scoville shall return Mr. Washington to the Sacramento County Jail by 5:00 p.m. on May 29, 2025. Investigator Scoville IS ORDERED to notify the government and Pretrial Services immediately if Mr. Washington is non-compliant with the conditions of release.
4. Defendant shall forthwith sign and his counsel file with this Court a Notice to Defendant Being Released which contains the appropriate advisements for such temporary release.
5. Funds for the time and expenses of investigator Scoville shall be paid out of the already approved investigative expert services funds authorized in this matter.

STIPULATION ON DEFENSE REQUESTED ORDER FOR DEFENDANT'S TEMPORARY
RELEASE

FINDINGS AND ORDER

IT IS SO ORDERED this 19th day of May, 2025


SEAN C. RIORDAN
UNITED STATES MAGISTRATE JUDGE

STIPULATION ON DEFENSE REQUESTED ORDER FOR DEFENDANT'S TEMPORARY
RELEASE